

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA
Alexandria Virginia

UNITED STATES OF AMERICA

v.

PAUL J. MANAFORT, Jr.,

Defendant.

Criminal No. 1:18 CR 83

The Honorable T.S. Ellis, III

**STIPULATION REGARDING 2012 LAND ROVER
PURCHASES AND LEASE**

The parties stipulate to the following facts:

1. On April 11, 2012, Paul and Andrea Manafort purchased a 2012 Land Rover Range Rover from Don Beyer Motors, Inc., also known as Land Rover of Alexandria
2. As part of the payment for that vehicle, on April 12, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$83,525.00 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Don Beyer Motors, Inc.
3. On April 25, 2012, Paul and Kathleen Manafort leased a 2012 Land Rover Range Rover.
4. As the down-payment for that vehicle, on May 2, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$12,525.00 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Don Beyer Motors, Inc.
5. On June 28, 2012, Paul and Kathleen Manafort, using company John Hannah, LLC, purchased a 2012 Land Rover Range Rover.

6. As part of the payment for that vehicle, on June 29, 2012, a wire transfer from Lucicle Consultants Limited in the amount of \$67,655.00 drawn on a bank account at Marfin Laiki Bank in Nicosia, Cyprus was sent to Don Beyer Motors, Inc.

7. The records attached to this stipulation as Exhibits A through C are records of Don Beyer Motors, Inc. and constitute records of a regularly conducted business activity pursuant to Rule 803(6) of the Federal Rules of Evidence, without requiring further authentication, certification, witness testimony, or the testimony of a custodian of records.

a. Exhibit A is a copy of documents reflecting the purchase of the 2012 Land Rover Range Rover on April 11, 2012.

b. Exhibit B is a copy of documents reflecting the April 25, 2012, lease of the 2012 Land Rover.

c. Exhibit C is a copy of documents reflecting the purchase of the 2012 Land Rover Range Rover on June 28, 2012.

We ask for this:

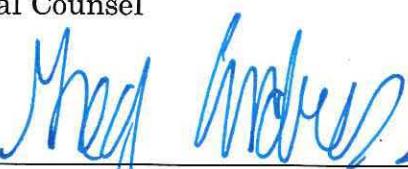
Paul J. Manafort, Jr.,
Defendant

By:


Kevin Downing, Esq.
Tom Zehnle, Esq.
Jay Nanavati, Esq.
Counsel for Defendant

ROBERT S. MUELLER, III
Special Counsel

By:


Andrew Weissmann
Greg D. Andres
Brandon L. Van Grack
Special Assistant United States Attorneys
Uzo Asonye
Assistant United States Attorney